

THIRD DEFENSE

Plaintiff's claims may be barred by the equitable defenses of laches, unclean hands, and equitable estoppel.

FOURTH DEFENSE

Plaintiff's damages, if any, were caused by the acts and/or omissions of third parties for whose conduct CBCS is not responsible.

FIFTH DEFENSE

Plaintiff's claims are barred or limited to the extent she has not mitigated her damages (if any).

SIXTH DEFENSE

To the extent that any violation of state or federal law took place, said violation was not intentional and resulted from a bona fide error rather than occurred notwithstanding the maintenance of procedures reasonably adapted to avoid such errors.

SEVENTH DEFENSE

Plaintiff may have waived any and all claims she may have had against CBCS.

EIGHTH DEFENSE

To the extent there were any violations of state or federal law, such purported violations were not done by CBCS with the requisite intent or knowledge.

NINTH DEFENSE

CBCS complied with all applicable requirements of the FDCPA, 15 U.S.C. § 1692 *et seq.*

TENTHDEFENSE

CBCS is entitled to all defenses, presumptions, and inferences provided by the FDCPA, 15 U.S.C. § 1692 *et seq.*

ELEVENTHDEFENSE

CBCS seeks all fees, expenses, costs, and any legal expenses recoverable from Plaintiff that may be available under the FDCPA, including but not limited to fees under 15 U.S.C. § 1692k(a) as the prevailing party on an unsuccessful pleading, motion, or other paper filed in bad faith or for purposes of harassment.

TWELFTHDEFENSE

Plaintiff lacks a private right of action for an alleged violation of O.R.C. § 1319.12(G).

THIRTEENTHDEFENSE

Plaintiff's claims are barred to the extent CBCS is not a "collection agency" as defined by the FDCPA or O.R.C. § 1319.12(G).

FOURTEENTHDEFENSE

CBCS reserves the right to amend or add more defenses as necessary.

WHEREFORE, CBCS respectfully requests that this Court:

1. Dismiss Plaintiff's Complaint with prejudice;
2. Enter judgment in favor of CBCS and direct Plaintiff to recover nothing from CBCS;
3. Grant CBCS its attorneys' fees, expenses, and costs pursuant to 15 U.S.C. § 1692k(a); and
4. Grant to CBCS such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/JocelynC.DeMars

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AttorneysforDefendantCreditBureau
CollectionServices,Inc.d/b/aCBCS

CERTIFICATEOFSERVICE

This is to certify that on the 18th day of July, 2012, the foregoing was electronically filed via CM/ECF, and a copy of this Answer was served upon the following:

Jack E. McCormick
500 City Park Avenue
Columbus, Ohio 43215.

12, the foregoing was electronically filed via CM/ECF, and a copy of this Answer was served upon the following:

/s/JocelynC.DeMars

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